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Via Electronic Comment Filing System

August 25, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: Notice of *Ex Parte* Meeting – Structure and Practices of the Video Relay Service Program, Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

On August 23, 2016, Angela Roth, President and Chief Executive Officer, ASL Services Holdings, LLC dba GlobalVRS (“Global VRS”) and Gabrielle Joseph, Vice President and Chief Operations Officer, GlobalVRS, met separately with Jennifer Thompson, Special Advisor and Confidential Assistant to Commissioner Rosenworcel, Nick Degani, Legal Advisor to Commissioner Pai, and Holly Sauer, Legal Advisor to Chairman Wheeler, to discuss GlobalVRS’ August 12, 2016 *Emergency Petition for Extension of the Rate Relief Termination Date on ASL Services Holdings, LLC dba GlobalVRS* (“Emergency Petition”).

Ms. Roth explained the basis for GlobalVRS’ *Emergency Petition* including the unchanged circumstances since the Commission’s March 3, 2016 limited compensation relief for Tier 1 providers. Ms. Roth noted that despite the limited rate relief, GlobalVRS’ costs are still not being compensated, while the reforms that had been understood as being implemented prior to the limited compensation relief expiration remain pending. She further noted that provision of specialized Spanish language translation and service to the Deaf-Blind have also exacerbated the Company’s uncompensated costs. Ms. Roth also underscored the challenges of building market share against entrenched incumbent providers, including a virtual monopoly provider whose

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overwhelmingly dominant market share remains effectively unchanged since GlobalVRS initiated service in late 2011, particularly when GlobalVRS' own allowable service costs are not being fully compensated.

Respectfully submitted,

MILLER ISAR, INC.

/s/ Andrew O. Isar

Andrew O. Isar

Regulatory Consultants to
ASL Services Holdings, LLC dba GlobalVRS

cc: Jennifer Thompson (via Email)
Nick Degani (via Email)
Holly Sauer (via Email)